

Exhibit I

Marcel-Paul Frankie Muscat

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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JOHNN BASCI, et al.,

**AFFIDAVIT OF MARCEL-PAUL
FRANKIE MUSCAT**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF NEW YORK)

MARCEL-PAUL FRANKIE MUSCAT, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 520 East 72nd Street, Apt. 8N, New York, New York 10021.

2. I am currently 41 years old, having been born on February 11, 1981.

3. I am the son of Peter Muscat, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from prostate cancer on January 11, 2010. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I had a good relationship with my father. Before he became sick, I had recently graduated from college and was early in my professional career. I lived with my parents at this time, so I would see my father every day. We would eat dinner together and speak with each other every night. I would also spend time with my parents on the weekends when they travelled outside Manhattan to their second home. Overall, we shared a good, typical father and

son relationship.

6. My father did not speak much about his experience on September 11, 2001, but he slowly shared details over the years. My dad went to his store in Lower Manhattan at around 7:30 a.m. that day like usual. It was a beautiful day, and he was sweeping the sidewalk in front of his store, with the door to the store open. He heard the first plane hit and looked up to see the impact. Others in the neighborhood he knew came out onto the street with him. He then watched the second plane hit the South Tower, and it was at this point that he realized it was time to go. He locked up and closed his business in preparation of leaving, and it was at this point he saw the first building start to collapse and the smoke coming towards him. He started to run north or northeast towards the Chinatown area and became covered in dust. He found a park in Chinatown with a fountain, and he washed himself and his stuff there.

7. After this, he decided to walk back to Lower Manhattan where his store was to make sure that everything was ok. He told me that when he got back to his store, the area was a mess and there was debris everywhere. He made sure the locks on his store were secure and then walked home. We did not hear from him for hours – I myself did not hear he was ok until 4:00 or 5:00 p.m. that day. He became covered in dust like those you see in pictures.

8. I believe my father returned to his store the Saturday following the attacks. He had wanted to go earlier but was unable to due to the situation in Lower Manhattan.

9. I remember learning about my father's illness while sitting at my parent's kitchen table for dinner. My mom mentioned it to me. He began undergoing two different rounds of treatments, with the second being chemotherapy. I remember taking days off of work in order to go to his chemotherapy appointments to meet his doctors and help comfort him. I did this a handful of times while my mom was taking care of the business.

10. My father's illness had a negative emotional impact on me. I was living with him and my mother at the time, and so I watched his decline from being a strong, healthy man to a skinny, sick one. He transformed from a person who could do anything to someone who could not do very much – he was in pain and at one point did not want to drive, so I had to drive every time. Witnessing this weighed on me, especially at my young age when I was still trying to figure out what to do.

11. Shortly before he became ill, my father had started to discuss retirement plans and different things he had hoped to do. He wanted to retire within that year, sell his business, and

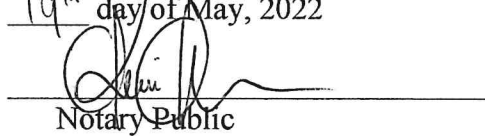
have the opportunity to travel. That plan disappeared with his illness and death.

12. Discussing and thinking about my father's illness and passing still makes me upset. He deserved better than to suffer like he did, and his illness and death should not have happened like it did. He had always joked that he would live to 100, and so to see him deteriorate so quickly and die so much younger than he wanted was difficult. It still hurts me. My father did not deserve to die the way he did.



MARCEL-PAUL FRANKIE MUSCAT

Sworn to before me this
19th day of May, 2022


Notary Public

KEVIN LOPEZ
Notary Public, State of New York
Registration No. 01L06391399
Qualified in New York County
Commission Expires May 6, 2023

Anthony Mustillo

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al.,

**AFFIDAVIT OF
DORA MUSTILLO ON BEHALF
OF ANTHONY MUSTILLO**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)
: SS.:
COUNTY OF MIDDLESEX)

DORA MUSTILLO, on behalf of ANTHONY MUSTILLO, being duly sworn, deposes
and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 106 Lincoln Avenue, Carteret, New Jersey 07008. I am the wife of Michael Mustillo, upon whose death my claim is based.

2. My son, Anthony Mustillo, is also a plaintiff in the within action, is over 18 years of age, and resides at 106 Lincoln Avenue, Carteret, New Jersey 07008. Due to Anthony's cognitive impairment, I submit this Affidavit on his behalf in connection with the pending motion for a default judgment and in support of his solatium claim.

3. Anthony is currently 28 years old, having been born on May 2, 1994.

4. Anthony is the son of Michael Mustillo, who passed away from lung cancer on August 5, 2014. It was medically determined by the World Trade Center Health Program that

this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Michael and Anthony were always together. Anthony is autistic and suffers from behavioral issues. Michael was the only one who could keep him under control. Anthony was always a difficult child as a youngster. He was a biter and had temper tantrum issues. Michael truly understood Anthony like no one else. Michael's death was a significant loss for Anthony. They were together every day, and when Michael passed away, it was hard for Anthony to understand why his father wasn't around anymore.

6. On 9/11, Michael was an electrician for the Port Authority and was sent to do electrical work at Ground Zero on the day of the attacks. He helped out the rescue workers cleaning up the site. Anthony was only about seven years old and was attending a special school. I pulled him out of school that day and took him and my other son, Michael Jr., home. I explained to my kids about the attacks on the World Trade Center. Anthony couldn't comprehend what had occurred.


7. When Michael got sick, I was open with my children. I didn't want to hide anything from them. I told them their father was sick, and I tried to stay positive for their sake. Unfortunately, Michael's condition deteriorated very rapidly. He died within six months. The lung cancer was already at Stage III when Michael was diagnosed. He started doing chemo right away, and there was some improvement. The doctors then tried radiation, which didn't work. The cancer began to metastasize, and things took a turn for the worse.

8. Michael's illness was extremely hard on Anthony. Anthony didn't understand why things were changing in his home—first when we had to set up oxygen tanks around the house, and later when we turned our living room into a hospice for Michael. Anthony was a

mischievous kid. He sometimes would shut off the oxygen tanks. He didn't know any better. He also didn't understand why his dad couldn't play with him or spend time with him the way he used to.

9. Without Michael's financial help, it wasn't easy taking care of my three children, particularly Anthony. I had to apply to put him in a group home. Anthony needed Michael. He responded to Michael. Michael understood him. I wasn't as strong as Michael and couldn't handle Anthony the same way. Now, I worry about Anthony. He had already lost his father. If I die, I worry about who will be there to take care of him. I go every week to the group home to see him, and he seems to be doing well. But things have been very different for him since Michael's death.

10. Anthony is primarily non-verbal and has the mentality of a five-year-old. He doesn't fully understand what happened to his father. I tell him, "Daddy is in heaven," and I show him his gravestone, but all he knows is his father isn't here anymore. Life is demanding without Michael. It has changed our family.


DORA MUSTILLO, ON BEHALF
OF ANTHONY MUSTILLO

Sworn to before me this
22nd day of June, 2022



Notary Public

KIRTIDA DHARIA
NOTARY PUBLIC
STATE OF NEW JERSEY
MY COMMISSION EXPIRES AUG. 18, 2024

Dora Mustillo

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOHNN BASCI, et al.,

AFFIDAVIT OF
DORA MUSTILLO

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY)
 : SS.:
COUNTY OF MIDDLESEX)

DORA MUSTILLO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 106 Lincoln Ave, Carteret, New Jersey 07008.

2. My current age is 53, having been born on October 29, 1968.

3. I am the wife of Michael Mustillo, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from lung cancer on August 5, 2014 at the age of 48. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Michael and I were married for twenty-two years. We were very involved with our children, especially their sports. My daughter was a dancer, and we used to travel a lot with her to dance competitions. Our kids played soccer, and we'd go to all their soccer games. We were a happy family. We lived in the same house since we got married. We raised three children together. Things became much more difficult when Michael got sick. We couldn't travel like we

used to or do as much as we wanted to.

6. Michael was an electrician for the Port Authority. Within hours after the attacks on 9/11/2001, he was called to start working at the World Trade Center. He was stationed at Jersey City and was called over to Manhattan, where he began work on the cleanup. He worked there for six months, working tons of overtime. He would work from 7:00 a.m. to 7:00 p.m. every day. I was eight months pregnant at the time. He was sad and depressed. Of course, the whole world was upset, but for Michael it hit particularly close to home. He used to come home all covered in white ash. I made him come in through the side door in the basement of our home, so he could wash his clothing separately. That dust, it probably was a little bit of everything from the towers—glass, concrete, and even human remains.

7. A few years after I had my daughter, Michael started to fall ill. At first, we thought it was just allergies. We took him to the doctors, who first diagnosed him with an autoimmune disease called scleroderma. From there, it only escalated. He had a constant dry cough that wouldn't go away. I knew something was wrong because he was losing weight rapidly, and he was a thin man to begin with. He was a healthy person, who drank only on occasion. Michael regularly exercised and even set up our basement with weights. He dedicated his life to his family and work and was serious about his health. He made sure to go for biopsies with the World Trade Center Health Program. The first biopsy was negative, and a few years later he did another biopsy which was positive. Michael was diagnosed with Stage III lung cancer in early 2014.

8. When Michael got the positive biopsy, we started his chemotherapy right away. I was his primary caretaker during that time. I drove him to all his appointments and administered all his medications. When he was diagnosed, I took Family and Medical Leave Act time off. He also couldn't work anymore, so he went on permanent disability. That was just enough money to cover the bills. He had two radiation treatments, but nothing was working. From the time of his diagnosis to his death was so fast, only six months.

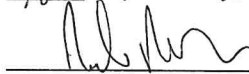
9. It was hard on our children. It was hard to explain to them what was going on. When he passed away, my youngest child was only twelve years old. My older son is autistic, and it was difficult to explain the situation to him as well. It was also very difficult to take care of my autistic son and my disabled husband at the same time. It was a rough time. I tried to be upfront, be strong for my husband. I didn't want to cry in front of him, even if I was upset. But

it is hard. Even thinking about it now is difficult. Many years later, I still get emotional. The worst part for me was explaining to the kids what was going on. I didn't want to hide anything from them. I didn't want to hurt them psychologically by hiding the truth from them. I was always upfront. But it was hard to see the way they reacted.

10. Michael loved his family, his mother, his pets, and his wife and children. He was a very good man. It's saddening that this happened to us and our children. He told me at the end of his life that he knew he was going to die. What do you say to that? I told him, I'll be fine and that he should watch over us. Now, our youngest daughter is in college. She was only twelve years old when he died. I'm trying to make everything work. Life is not fair...you have to be stronger and keep moving forward, but it hurts.


DORA MUSTILLO

Sworn to before me this
16th day of May, 2022



Notary Public



Michael L. Mustillo Jr.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al.,

AFFIDAVIT OF
MICHAEL L. MUSTILLO, JR

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)
: SS.:
COUNTY OF MIDDLESEX)

MICHAEL L. MUSTILLO, JR., being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 106 Lincoln Avenue, Carteret, New Jersey 07008.

2. I am currently 26 years old, having been born on June 1, 1996.

3. I am the son of Michael Mustillo, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from lung cancer on August 5, 2014, at the age of 48. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. I was very young when my father became ill, and most of what I remember surrounds his illness. I played soccer, and my father was always freezing in the cold weather when he came to my games. Winter was the most challenging time for him. I remember him having difficulty shoveling the driveway. When I was a kid, he used to take me to Jets games, but that stopped when he was diagnosed because he was too sick to be around big crowds.

6. On 9/11, I was very young. I was only five or six years old, and I don't remember anything from the day. I know my father worked for the Port Authority. He was cleaning up at the World Trade Center after 9/11, and he wasn't provided with any protective equipment, like a mask. He didn't describe too much of his experience to me. He didn't like to talk about it. He worked at Ground Zero for six or seven months. In 2009 or 2010, my father was diagnosed with an auto-immune disease called scleroderma. That's when his health started to deteriorate


7. In 2014, my father was diagnosed with lung cancer during my senior year of high school. He was constantly losing weight and was extremely thin before he died. He was vomiting all the time, purging almost everything that he ate. His motor skills suffered, and he had a hard time gripping objects. He couldn't stand the cold weather. He became very depressed. He died only a month and a half after I graduated high school.

8. When my father was ill, it was hard to live in the same household. It was difficult to watch him suffer. I couldn't do much to help him, especially toward the end. He was very limited in leaving the house because of his illness and his weak immune system. When my mother would go to work and my sister to dance practice, I stayed home and cared for my father. As a teen, it was hard to go through high school and enjoy that part of my life when my father was so sick. It was very saddening, and I often became depressed.

9. After my father passed away, life became extremely hard for my family. My mom became a single mother. I was only eighteen when my father died; my sister was twelve. My older brother, who was twenty years old, is disabled. It was definitely challenging after he passed away for the four of us. My entire teen years were stressful and depressing. It was hard to go out to dinner and do regular family activities. My father was a good man, and I wish I could have had more time with him.

Michael Mustillo 6/22/2022
MICHAEL L. MUSTILLO, JR.

Sworn to before me this
22nd day of June, 2022



Notary Public

KIRTIDA DHARIA
NOTARY PUBLIC
STATE OF NEW JERSEY
MY COMMISSION EXPIRES AUG. 18, 2024

Brian Nagle

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al.,

AFFIDAVIT OF
BRIAN NAGLE

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF RICHMOND)

BRIAN NAGLE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 492 Lynn Street. Staten Island, New York 10306.

2. I am currently 24 years old, having been born on April 22, 1998.

3. I am the son of Janet A. Nagle, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My mother passed away from kidney cancer on April 1, 2018, at the age of 58. It was medically determined by the World Trade Center Health Program that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I was 20 years old at the time of my mother's death.

6. My mother held a very special role in my life. She was the one person who I was closest to. She was my go-to person for everything. When good things happened, she was the first person I told. The same with the bad. Anytime I needed to talk something out, my mom

was there for me. Anytime I needed anything at all, my mom was there. She never let me down. She never missed any of my sporting events.

7. I was 3 years old at the time of the attacks on 9/11, so most of what I know I learned after the fact from my mother. She was a nurse at the time working at Merrill Lynch. Instead of running in fear for her own safety that day, my mother stayed to help others. Despite being one of the people being engulfed in the dust cloud, she gave triage to those who needed it. She continued to perform triage in the weeks following the attacks, and her selfless acts earned her the American Nurse Red Cross Hero Award in 2002.

8. I did not learn of my mother's illness until later on. She had begun feeling ill in 2016 and went to go see a doctor. She had not told me any of this until Christmas 2017. She told me it wasn't that serious and not to worry. She was wrong. Things accelerated quickly after she told me of her cancer. She had been a part of a clinical trial, but it didn't seem to be helping. Her cancer spread quickly, and by April 2018, she was gone. I barely had time to digest the fact that she had cancer before I lost her to it.

9. I was young during my mother's illness and could not be there for her as much as I would have liked to have been. My focus was on school, but I did what I could for her. I would run errands for her, pick up her prescriptions, or whatever else she needed me to do. When the situation became dire and we knew that she was close to the end, I took off from school to be with her as much as possible. Losing her hurt me deeply. It still hurts. She was the closest person to me in my life. All of the research I did said her cancer wasn't that bad. I was shocked when we lost her. I never saw it coming. I always believed that no matter how bad it got, she would fight through it and beat it. That turned out to be wishful thinking.

10. My mother's legacy is one of selflessness. She was the kind of person who tried to help everyone she could. It was not limited to the events surrounding 9/11. She did everything for me in my life. I was her pride and joy, and she was mine. I will forever miss her.

Sworn to before me this
3rd day of June, 2022


Notary Public


BRIAN NAGLE

2 KYLE R TITO CARABAJO
NOTARY PUBLIC-STATE OF NEW YORK
No. 01TI6351919
Qualified in Kings County
My Commission Expires 12/12/24

Richard Nagle

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al.,

**AFFIDAVIT OF
RICHARD NAGLE**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF RICHMOND)

RICHARD NAGLE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 492 Lynn Street, Staten Island, New York 10306.

2. I am currently 64 years old, having been born on January 30, 1958.

3. I am the husband of Janet A. Nagle, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My wife passed away from kidney cancer on April 1, 2018, at the age of 58. It was medically determined by the World Trade Center Health Program that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Janet and I were very happily married and had one son. We were very close and always wanted to be with each other. We did a lot of traveling, like going to Ireland. She was very active in my life, and I in hers. We were both devoted to our son and were involved in his life. We even coached his sports teams together. We had a truly happy marriage.

6. On 9/11, Janet was working as a nurse for Merrill Lynch at the World Financial Center. I worked across the street at 90 West Street. When the planes hit the World Trade Center towers, Janet jumped into action and administered triage at the corner of West Street and Vesey Street. I was running north on West Street and saw her as the first tower was falling and a smoke cloud was engulfing the area. I begged her to get out of the area, but she insisted on staying to help take care of the victims. She stayed downtown that entire day and continued going back each day after to perform triage. Once she was done with that, Merrill Lynch relocated to Park Place, so she was in the exposure zone the entire time. Janet worked for Merrill Lynch until 2005.

7. Janet was a very healthy, active woman. In about 2016, she started to not feel well. She went to the doctor and was diagnosed with a rare form of kidney cancer. That type of cancer was usually genetic. They performed a gene test, but no one in her family had the gene. The doctors at NYU Langone attributed the cancer to her exposure at the World Trade Center site. We were completely taken by surprise. We thought we were done with 9/11. Because Janet's cancer was so rare, she couldn't be treated with chemotherapy. The doctors offered for her to join a clinical trial. For 9 months, she took immunotherapy drugs that we hoped would help. But her cancer started to metastasize to her appendix, lungs, and bones. She cracked a femur and was in the hospital for a while. Her condition then worsened, and she was rushed to Staten Island University Hospital. She stayed in the hospital for three weeks before her death in April 2018.

8. The entire ordeal was horrible. At first, they gave her a 5-year prognosis. We were reeling just from the thought of only having 5 more years to spend with her. At the time Janet was diagnosed, our son Brian was only a freshman in college. Janet just wanted to make it to his college graduation. We tried to hold back the news from him as long as we could and only told him of her cancer when Janet started getting treatment. Things went south rather quickly. I had to put on a strong front, but her illness took a toll on everyone. It particularly affected Brian, who not only just learned of the severity of his mother's condition, but had to leave school for a month while Janet was in the hospital.

9. I had to enlist family members to come and help us out around the house. Janet was the focal point of my life and now she was sick. I needed someone to help us with the

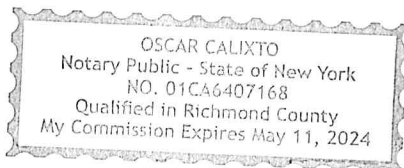
house, the cooking, and the dog. During her illness, I had to keep working. I used up all 5 weeks of my vacation, plus all of my sick days to be with Janet while she was in the hospital. There was no adjustment period either. The 5 years we thought we would have her turned out to be less than 18 months. Janet was never a complainer. She was strong. She always put on a good face, no matter how bad it got.

10. In 2002, Janet won an American Red Cross Nurse Hero Award for her efforts on 9/11. She was given the award at a ceremony in Washington D.C. She could have left and run home on 9/11, but she didn't. Being who she was, she could never have done that. She kept on going back. She truly deserved that Nurse Hero award. She should've also gotten a "Wife and Mother Hero" award. She deserved that as well, but we'll never have the chance to present it to her. I miss my beautiful wife every day.


RICHARD NAGLE

Sworn to before me this
9th day of May, 2022


Notary Public



Kimberly Sue Mullins

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al.,

AFFIDAVIT OF
KIMBERLY SUE MULLINS

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF WEST VIRGINIA)
 : SS.:
COUNTY OF HAMPSHIRE)

KIMBERLY SUE MULLINS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2832 Don McCauley Road, Romney, WV 26757.

2. My current age is 60, having been born on December 30, 1961.

3. I am the daughter of Donald Allen Newcomer, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from COPD and lymphoma on April 29, 2017. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father was always a big part of his children's lives. He was the best granddad and was very involved with all of his grandkids. He loved fishing and riding horses. We grew up riding horses. My dad was a farmer and kept his own horses on the farm. Those are some of my favorite memories. He was involved in our lives as children and as we grew up. It's been exactly five years since he died, and we miss him.

6. My father was a first responder on “the pile” at the World Trade Center. He worked with Homeland Security and FEMA to do whatever they needed, which included search and recovery. He responded to the World Trade Center almost immediately after 9/11 and was working there for several months. He worked for the first ninety days, then came home for a few weeks, and then worked for another ninety days. My dad didn’t like to talk much about his experience. I know that it really bothered him, and I know he saw some terrible things.

7. Probably sometime during 2002, I started to notice a difference in my father’s breathing. He had shortness of breath, which kept getting worse. The doctors told us he had pseudomonas, a bacterial infection which spread to his lungs. He was in and out of the hospital, had no energy, and he was always gasping for breath. He would uncontrollably cough for hours. When we took him to the hospital, they would have to vacuum his lungs. I remember times when I would get a cold and think about how bothersome the coughing was and then realizing that my dad was dealing with the same thing every day for years. He could barely even speak without coughing. It was shocking to me to watch him decline, especially because he was a healthy person before 9/11. He never smoked cigarettes and lived a generally healthy lifestyle.

8. My dad’s breathing treatments were extremely expensive. He was on a nebulizer which cost \$7,700 per month. He was prescribed inhalers, cough medications, and codeine syrup, but nothing helped him. He did high frequency chest wall oscillation, which was a treatment to help loosen mucus in his lungs. He also was on an oxygen tank, and he couldn’t sleep or get around without oxygen toward the end of his life.

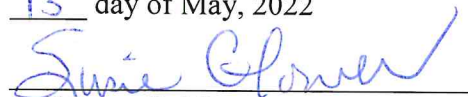
9. We had just moved to West Virginia from Maryland when my dad got sick. My mom was taking great care of him, but she couldn’t do it all on her own. My siblings and I were going back and forth between Maryland and West Virginia to give my mom a break. But she never wanted to be away from my dad—even if she just went back to the grocery store, she’d always be back in a hurry. We were mostly there to support our dad and spend time with him. When my father passed, my mom started to suffer the effects of post-traumatic stress. His illness was extremely stressful and all-consuming for her. When he died, she was all alone, with nothing to do and no spouse. My mom lives with me now, because she needs someone to look after her.

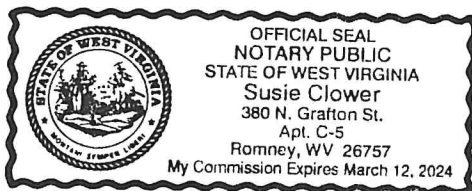
10. My dad’s death has a very heavy impact on me. He was a good person. He meant a lot to a lot of people. He was a Maryland State Trooper, and all the policemen knew him. If he could help you, he would help you. That’s the honest truth. I’m sure there’s so much we don’t

even know he did to help others. He instilled the value of helping in all of us. He was so present in our lives, no matter what. He was very involved, especially with our kids. His grandkids adored him. He was a very good man—very loved, and very missed.


KIMBERLY SUE MULLINS

Sworn to before me this
13 day of May, 2022


Notary Public



Bonnie Patricia Newcomer

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

JOHNN BASCI, et al.,

**AFFIDAVIT OF BONNIE
PATRICIA NEWCOMER**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF WEST VIRGINIA)

: SS.:

COUNTY OF HAMPSHIRE)

BONNIE PATRICIA NEWCOMER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2832 Don McCauley Road, Romney, WV 26757.

2. My current age is 79, having been born on December 12, 1942.

3. I am the wife of Donald Allen Newcomer, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from COPD and lymphoma on April 29, 2017. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Donald and I had a very good relationship. He was funny and made me laugh all the time. We liked to travel. We lived on a farm and had horses. We would always go horseback riding. He was just the love of my life and a wonderful man. Everybody loved him. There were over a thousand people at his funeral, that's how much people liked him.

6. My husband responded to the World Trade Center shortly after September 11. When he was needed at Ground Zero, I asked him, "Do you have to go?" He said, "I really do. They're going to need all the help they can get." He was there with Homeland Security, working on "the pile," removing bodies and bodily remains. He also worked at the makeshift morgue to identify bodies. Donald worked at the World Trade Center for ninety days straight, then returned home for a couple of weeks. He then went back to work at Ground Zero for another ninety days.

7. After he came home from the World Trade Center, he seemed okay at first. Then, he started coughing a lot and had trouble breathing. He was diagnosed with pseudomonas and had to get his lungs vacuumed. He had an inhaler and underwent many breathing treatments. After several years, he couldn't go anywhere without an oxygen tank. He was in a wheelchair and lost his ability to drive or do anything else, including taking care of his farm.

8. We would take him to a hospital about an hour away. We would take him to the University of Maryland Baltimore City Hospital, where they would put him on oxygen and give him breathing treatments. He was treated there often for pneumonia. He was going to do a lung transplant, but his lungs were too weak, and the risk was too high.

9. I was Donald's primary caretaker during the time of his illness. I took care of him 24/7 and did whatever he needed. The nurses at the hospital taught me what to do. It was hard for me to take care of him on my own. Over time, he became weak, and had to use a walker. The day of his death, he had a fall in our living room. He was a big man, and I was small, so it was hard for me to get him up. I couldn't get him to the recliner, so I got him a pillow and rushed to call 9-1-1. By the time the ambulance arrived, he had passed away.

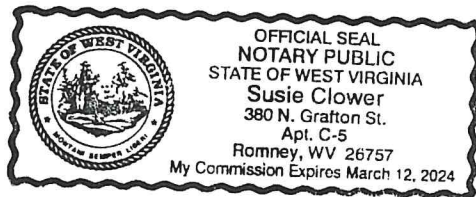
10. Donald's death completely re-arranged my life. I had to sell the family's farm in Maryland, and we didn't have any other family that lived nearby—the rest of our family was in West Virginia. So, I moved in with my daughter in West Virginia, and eventually my children built a separate home for me. The roads in West Virginia are narrow and winding, and I once drove off the road on accident and crashed the car. My driver's license was rescinded, and I can no longer drive. I am lonely now, as I had to move to a strange new place and can no longer drive to see friends or do things the way I would like to.

11. Donald was loved by so many people. He had a sense of humor, he made people laugh. I didn't mind taking care of him while he was ill, because he was the love of my life. He was so kind, and everyone loved him. I miss him terribly.

Bonnie P. Newcomer
BONNIE PATRICIA NEWCOMER

Sworn to before me this
13 day of May, 2022

Susie Clower
Notary Public



Joel Timothy Newcomer

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al.,

**AFFIDAVIT OF
JOEL TIMOTHY
NEWCOMER**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF MARYLAND)
 : SS.:
COUNTY OF DORCHESTER)

JOEL TIMOTHY NEWCOMER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1420 Town Point Road, Cambridge, Maryland 21613.

2. My current age is 52, having been born on April 20, 1970.

3. I am the son of Donald Allen Newcomer, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from respiratory disease and lymphoma on April 29, 2017. It was medically determined by the World Trade Center Health Program that these illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father and I had a special relationship. I was adopted and was always grateful for him adopting me. He was a good man. My father and I liked to go hunting together. We were farmers, so I helped him out around his farm. When I had children of my own, he was a wonderful grandfather and was involved with my children's lives as well. I lived close to my

father for many years, and I would visit him often. There is nothing negative I could ever say about my father or about our relationship. I was truly blessed to be his son.

6. My father was part of the Maryland State Police. He went down to Ground Zero shortly after 9/11 with FEMA. He was working there for at least a few weeks, maybe longer. He said the conditions were awful and that it was hard to breathe. He told me of the putrid smell everywhere. My father never offered any details about his experience. He didn't like to talk about it much. But if you asked him, he would tell you about it honestly.

7. Beginning shortly after 9/11, my father developed a cough that he couldn't shake. His respiratory illness got worse and worse over time, and eventually he was diagnosed with COPD and other respiratory ailments. It was a shock for me to see him so ill. Despite having many treatments, he eventually had to rely on an oxygen tank to breathe. I had to take on a bigger role maintaining the farm since he no longer had the strength to upkeep the livestock and the land. It frustrated him that he couldn't maintain his home and farm on his own anymore. I would take time off work to take care of him and help him whenever he needed. On top of his respiratory disease, my father was also diagnosed with lymphoma.

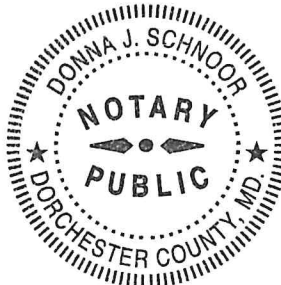
8. Toward the end of his life, my father couldn't even carry on a conversation without coughing until he was winded. His death was pretty devastating to me. Even though he was sick for a long time, it was still extremely upsetting when he died. Even though I knew it was inevitable that my father was going to pass away, I wasn't really prepared for it. I looked up to my father and was so grateful to him for the many ways he enriched my life. He was a good man, and it was hard to lose him.


JOEL TIMOTHY NEWCOMER

Sworn to before me this
15th day of May, 2022


Notary Public

my Commission Expires 6/22/23



Joseph Matthew Newcomer

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
JOHNN BASCI, et al.,

**AFFIDAVIT OF
JOSEPH MATTHEW
NEWCOMER**

Plaintiffs,

20-CV-00415 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF WEST VIRGINIA)
 : SS.:
COUNTY OF HAMPSHIRE)

JOSEPH MATTHEW NEWCOMER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 6180 Slanesville Pike, Points, West Virginia 25437.

2. I am currently 58 years old, having been born on September 30, 1963.

3. I am the son of Donald Allen Newcomer, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from respiratory disease and lymphoma on April 29, 2017. It was medically determined by the World Trade Center Health Program that these illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father was very involved in my life. We were best friends. We did everything together. We were both on the Maryland State Police force, and later on we both worked as private investigators. We had a special bond because we were both law enforcement officers.

Both of us were deployed to Ground Zero shortly after the 9/11 attacks.

6. My father arrived at the World Trade Center site the evening of 9/11. He worked with the mortuary teams to move bodies from the pile to the makeshift morgues. I was in charge of the police department's veterinarians, who oversaw the search dogs used to find the bodies. My dad worked on the pile every day for about ninety days. He then came back to Maryland for two weeks and returned to Ground Zero to work for another three months. It was sad, especially some of the things my father saw. He said retrieving body parts from the pile was a horrific experience.

7. Years later, my father started to have trouble breathing. The doctors told my father he had contracted an infection from Pseudomonas bacteria that he was exposed to when he worked at Ground Zero with dead and deteriorating bodies. The infection spread to his lungs, and he was having trouble breathing. He had to have his lungs vacuumed several times because they were filled with thick mucus. Days later, his lungs would fill back up and he'd be coughing again. He went to several specialists and was given many different breathing treatments, x-rays, and medications. He was ultimately forced to go on an oxygen tank. He was such a healthy person before he fell ill, always very strong and outgoing. He was a big man. It was shocking to see his health decline the way it did.

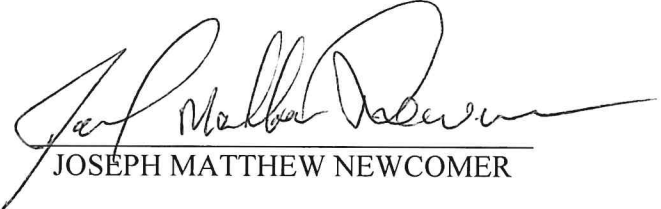
8. I left West Virginia and moved in with my father in Maryland so I could take him to doctor's appointments and care for him. He couldn't go anywhere without a wheelchair. My father weighed 240 pounds and my mom a mere 100 pounds. There was no way she could care for him or lift him on her own. There were several occasions when my father would collapse in the bathroom, and we'd have to call the fire department to help get him up. Breathing was so difficult for him that it just got to a point where he had no energy to do anything. He was totally worn out.

9. I took Family and Medical Leave Act time off to take care of my father. I paid for some of his medicines and took an extended leave of absence to stay with him.

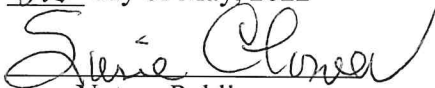
10. His illness was hard on me. I had always seen him to be such a hard worker and a go-getter. My dad had a farm, with horses and cattle to take care of. It drove him crazy not being able to take care of his livestock. Some days, I would drive him around the farm just so he could look out at it. But he didn't have the energy or the strength to run his farm anymore. It

tore me apart, watching him go down as quickly as he did.

11. My father left a legacy with the Maryland State Police. They still talk about him. The cases that he worked on, the things he did. They even wrote a book about him. It didn't matter how busy he was, my father would drop whatever he was doing to help someone, be it a stranger or a friend. One time, a man had just been locked up for murder. My father cooked him a steak dinner because he knew he'd never have a steak again. My father had compassion for all people, especially the homeless. He was always willing to give to them. He would go without to make sure that everyone else had what they needed. He was a good-hearted person, and I miss him terribly.


JOSEPH MATTHEW NEWCOMER

Sworn to before me this
26 day of May, 2022


Notary Public

